May 26, 2017

VIA CM/ECF

United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007
(212) 805-0276

Re: Kaldren LLC v. The Hain Celestial Group, Inc., No. 1:17-cv-3638-KBF

Dear Judge Forrest:

Plaintiff Kaldren LLC responds to your May 24, 2017, Order (Doc. 11) as follows. Plaintiff acknowledges that the U.S. Supreme Court's May 22, 2017, ruling in *TC Heartland* altered where patent infringement cases may be filed after Plaintiff filed this case in this Court on May 15, 2017. Under 28 U.S.C. § 1400(b) and *TC Heartland*, Defendant The Hain Celestial Group, Inc., "resides" in Delaware because it is incorporated there. Plaintiff also has evidence that Defendant has "committed acts of infringement and has a regular and established place of business" in New Hyde Park, New York. Therefore, this case now belongs in the District of Delaware or the Eastern District of New York.

Plaintiff requests that this Court transfer this case, *sua sponte* or by agreed motion of the parties, to the Eastern District of New York to save Plaintiff from having to dismiss this case, refile it there, and pay additional filing and service of process fees.

Respectfully submitted,

By: */s/ Jean-Marc Zimmerman*
Zimmerman Law Group
233 Watchung Fork
Westfield, NJ 07090
Tel: (908) 768-6408
Fax: (908) 935-0751
Email: jmz@zimllp.com

Counsel for Plaintiff
Kaldren LLC

OF COUNSEL:
Peter J. Corcoran, III
Texas State Bar No. 24080038
CORCORAN IP LAW, PLLC
2019 Richmond Road, Suite 380
Texarkana, Texas 75503
Tel: (903) 701-2481
Fax: (844) 362-3291
Email: peter@corcoranip.com

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record whom have consented to electronic service were served with a copy of this document under this Court's CM/ECF system and local rules on May 26, 2017.

/s/ Jean-Marc Zimmerman
Jean-Marc Zimmerman